

IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT
OF TEXAS MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-203-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

DECLARATION OF YANAN ZHAO IN SUPPORT OF PLAINTIFF
NETLIST, INC.'S RESPONSE TO MICRON'S SUPPLEMENT TO
DEFENDANTS' MOTION TO STAY (DKT. 348)

I, Yanan Zhao, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. ("Netlist") in the above-captioned action. I am a member in good standing of the State Bar of California and the Bar of Texas. I am admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist's Response to Micron's Supplement to Defendants' Motion to Stay. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of a screenshot of Netlist's website page, <https://netlist.com/products/memory-module/>, retrieved on December 17, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of the transcript of deposition of Micron's witness, Mr. Boe Holbrook, dated August 30, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of the transcript of deposition of Micron's witness, Mr. Scott Cyr, dated November 20, 2023.

5. Attached as **Exhibit 4** is a true and correct copy of the Petition for *Inter Partes*

Review of U.S. Patent No. 11,016,918, filed on May 17, 2022. IPR2022-00996, paper 1.

6. Attached as **Exhibit 5** is a true and correct copy of the Petition for *Inter Partes Review* of U.S. Patent No. 11,232,054, filed on May 17, 2022. IPR2022-00999, paper 1.

7. Attached as **Exhibit 6** is a true and correct copy of Petitioners' Reply to Patent Owner's Response, Paper 25 of IPR2022-00996, dated June 20, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of Petitioners' Reply to Patent Owner's Response, Paper 26 of IPR2022-00999, dated June 20, 2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 17, 2023, in Los Angeles, California.

By /s/ Yanan Zhao
Yanan Zhao